

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

---

REBECCA TERRY,

Plaintiff,

v.

COUNTY OF MILWAUKEE,  
DAVID A. CLARKE, JR.,  
in his personal and official capacities,  
OFFICER BRIAN WENZEL,  
JANE AND JOHN DOE,  
UNKNOWN EMPLOYEES OF  
MILWAUKEE COUNTY JAIL,  
JANE AND JOHN DOE,  
UNKNOWN JAIL SUPERVISORS,  
ARMOR CORRECTIONAL HEALTH SERVICES,  
CAROLYN EXUM, MORGAN BEVENUE,  
MARGARET HOOVER, JANE AND JOHN DOE,  
UNKNOWN EMPLOYEES OF  
ARMOR CORRECTIONAL HEALTH SERVICES,  
JANE AND JOHN DOE,  
UNKNOWN ARMOR HEALTHCARE SUPERVISORS,

Case No. 17-cv-01112

Defendants.

---

**AFFIDAVIT OF JENNIFER M. LUTHER IN SUPPORT OF  
INTERVENING DEFENDANT'S MOTION FOR DEFAULT JUDGMENT**

---

STATE OF WISCONSIN     )  
                                      ) ss.  
COUNTY OF DANE         )

JENNIFER M. LUTHER, being first duly sworn, on oath deposes and states:

1. I am an attorney licensed to practice law in the State of Wisconsin.
2. I am one of the attorneys representing Intervening Defendant Wisconsin County Mutual Insurance Corporation ("WCMIC") in this matter.
3. I make this Affidavit on the basis of my personal knowledge of the facts set forth herein.

4. I make this Affidavit in Support of Intervening Defendant's Motion for Default Judgment.

5. Defendant Morgan Bevenue's deadline to answer the Intervening Complaint was April 25, 2018. To date, Defendant Bevenue has not filed an answer to the Intervening Complaint for Declaratory Judgment or requested additional time to file an answer to the Intervening Complaint for Declaratory Judgment, and therefore has not joined any issue of fact or law in this case.

Dated this 27<sup>th</sup> day of April, 2018.

/s/ Jennifer M. Luther  
Jennifer M. Luther

Subscribed and sworn to before me  
this 27<sup>th</sup> day of April, 2018.

/s/ Megan J. Jerke  
Notary Public, State of Wisconsin  
My Commission expires: March 28, 2022